Delgado, Paige

From: Trivitt, Terry F CIV USARMY CASCOM (US) [terry.f.trivitt.civ@mail.mil]

Sent: Wednesday, November 13, 2013 12:19 PM

To: Delgado, Paige

Cc: King, James C CIV (US); Shimp, Upton R CIV USARMY CASCOM (US); Jett, Robin E CIV

(US); Cambron, Kimberly K CIV USARMY CASCOM (US)

Subject: RE: Overnight shipment to Terry Trivitt, Stuart, Oklahoma UPS (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Paige,

I received the two CDs this past Monday and I reviewed both yesterday afternoon and this morning. Listed below are my concerns with the information contained on the disks.

- 1. All transactions between Austin Powder and Explo were conducted on a pound basis by material type. There are no lot numbers associated with anything shipped either from Explo to Austin Powder or vice versa. So tying any of the stability tests to any of documents used to ship the material will not be possible. Big accountability and chain of custody issue.
- 2. Of all of the stability testing documents, only a few (less than a dozen) out of several hundred were actually signed by the analyst or the supervisor of the analyst. Documents do not indicate who did the testing, Explo or someone else. Also, documents do not indicate when the analysis occurred, one could assume testing occurred on day sample was taken but can't be positive of that. No chain of custody for QA/QC and no accountability.
- 3. On several of the stability testing documents, the average % of stabilizer is very near the minimum of 0.30 for Stability Code A. Most of these same documents indicate the testing was performed sometime in 2010, 2011 and a few in 2012. This being the end of 2013, these lots could very well be below the minimum of 0.30 now. Only testing can positively determine if these have fallen below the minimum. Currently only have one data point to try to determine trend analysis on stability, an impossible task to say the least.

My recommendation is to have this material tested prior to shipment of material off the Camden facility. There is simply too much risk of auto ignition associated with this material when the stability is in question. Testing could be conducted either via HPLC or the NIR portable test system for stability content prior to shipment. If you need anything else, please let me or Mr. King know. Thanks.

Terry Trivitt
Associate Director, USATCES
JMAC-ES
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McAlester, OK 74501-9002
DSN 956-8080
Comm (918) 420-8080

----Original Message----

From: Delgado, Paige [mailto:Delgado.Paige@epa.gov]

Sent: Friday, November 08, 2013 3:14 PM
To: Trivitt, Terry F CIV USARMY CASCOM (US)

Subject: FW: Overnight shipment to Terry Trivitt, Stuart, Oklahoma UPS

FYI.

1

From: Sanchez, Cesar

Sent: Friday, November 08, 2013 3:14 PM

To: Delgado, Paige Cc: Winkfield, Chanda

Subject: Overnight shipment to Terry Trivitt, Stuart, Oklahoma UPS

Mrs. Delgado,

This is to notify you, that this envelope will be shipped today via UPS priority overnight under following tracking number:

1Z A46 R22 01 9908 5751

Thanks,

Cesar A.Sanchez-Romero

12th Floor Mail, Copy and Supply Center for US Environmental Protection Agency Region 6 operated under contract by ASN Corporation

1445 Ross Avenue Ste 1200

Dallas, Tx 75202

tel. 214 665 6588

fax.214 665 8596

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Caveats: NONE